Case	8:21-bk-10525-ES Doc 226 Filed 09. Main Document	/09/21 Entered 09/09/21 15:51:33 Desc Page 1 of 5		
1 2 3 4 5 6	Robert K. Lu REID & WISE LLC 633 West 5th Street, 26th Floor Los Angeles, CA 90071 619-300-1849 Email: rlu@reidwise.com Edward Wu (admitted pro hac vice) REID & WISE LLC One Penn Plaza, Suite 2015 New York, New York 10119 Tel: (212) 858-9968 Email: ewu@reidwise.com			
8	Attorneys for the EB5 Investors; Beach O Hotel, LLC; and Beach Orangethorpe			
9	UNITED STATES	BANKRUPTCY COURT		
10	CENTRAL DISTRICT OF CALIFORNIA			
11	SANTA ANA DIVISION			
12	T	G N 0 21 11 10525 FG		
13	In re:	Case No.: 8:21-bk-10525-ES		
14	THE SOURCE HOTEL, LLC, a California limited liability company,	Chapter 11		
15 16	Debtor and Debtor in Possession.	NOTICE OF APPEARANCE AND REQUEST FOR NOTICE		
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23				
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26		un Liu, (3) Haiyuan Ma, (4) Zhen Liu, (5) Jiaxin Bao,		
27	(6) Liu Shanshan, (7) Shengkeng Chen, (8) Yichen Lei, (9) Zihe Xu, (10) Xinyi Zhou, (11) Li Dan, (12) Rui Bai, (13) Haiwan Du, (14) Yijian Jiang, (15) Lei Liang, (16) Yi Wan, (17) Yue			
28		(20) Jianyao Zhang, (21) Jing Zhang, (22) Yuyun Wu, an Huong Thao, (26) Kwok Shung Chi, and (27) Sundi		

Case 8:21-bk-10525-ES Doc 226 Filed 09/09/21 Entered 09/09/21 15:51:33 Desc Main Document Page 2 of 5

TO ALL PARTIES, THEIR RESPECTIVE COUNSEL, AND THE CLERK OF THE BANKRUPTCY COURT:

PLEASE TAKE NOTICE that Mr. Jian Hua, an EB5 investor of Beach Orangethorpe Hotel, LLC ("BOH1"), has now been duly appointed as the Special Manager² of both BOH1 and Beach Orangethorpe Hotel II, LLC ("BOH2") in accordance with the voting procedures set forth in the Operating Agreements for BOH1 and BOH2.³

PLEASE TAKE FURTHER NOTICE that the Operating Agreements for BOH1 and BOH2 provide that, upon appointment, the Special Manager shall have, *inter alia*, the "sole right and responsibility" to "represent [BOH1 and BOH2] in connection with negotiating, enforcing or otherwise dealing with the failure of the [Debtor] to pay the Loan when due to [BOH1 and BOH2]."⁴

PLEASE TAKE FURTHER NOTICE that, at the direction of the Special Manager, the undersigned counsel is appearing on behalf of creditors BOH1 and BOH2 in the above captioned chapter 11 case.

[Remainder of Page Intentionally Left Blank]

The term, "Special Manager," shall have the meaning ascribed to it in the Operating Agreements (as hereinafter defined).

Operating Agreement for Beach Orangethorpe Hotel, LLC, dated August 1, 2013 (the "BOH1 Operating Agreement"); Operating Agreement for Beach Orangethorpe Hotel II, LLC, dated June 19, 2015 (the "BOH2 Operating Agreement," and together with the BOH1 Operating Agreement, the "Operating Agreements").

BOH1 Operating Agreement, §5.2.4; BOH2 Operating Agreement, §5.2.4.

Case	8:21-bk-10525-ES [09/21 Page		ed 09/09/21 15:51:33	3 Desc
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	PLEASE IA	KE FUKI	I HEK NO.	IICE u	iat any i	notices, documents, or	pleadings to
2	be physically served	to BOH1 a	nd BOH2 1	nust be	served	at the following addre	ss:
3	Edward V		C				
4	1 1	WISE, LL n Plaza, Su					
5	New Yor	k, New Yo	ork 10119				
6	11	() 858-9968 wu@reidw:					
7							
8	Dated: New York, No September 9,						
9					_		
10						/s/ Edward Wu Robert K. Lu	
11						Edward Wu	
12						REID & WISE LLC 633 West 5th Street, 2	6th Floor
13						Los Angeles, CA 900' 619-300-1849	
14						REID & WISE LLC	
15						One Penn Plaza, Suite New York, New York	
16						Tel: (212) 858-9968	10117
17						Attorneys for the EB5	Invastors
18						Beach Orangethorpe I and Beach Orangetho	Hotel, LLC;
19						LLC.	1
20							
21							
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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

One Penn Plaza, Suite 2015 New York, New York 10119

A true and correct copy of the foregoing document entitled (specify):

NOTICE OF APPEARANCE AND REQUEST FOR NOTICE

will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

- 1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) 9/9/21, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:
- Ron Bender rb@lnbyb.com
- Christopher G. Cardinale ccardinale@agclawfirm.com, <u>mgonzalez@agclawfirm.com</u>
- Michael G Fletcher mfletcher@frandzel.com, sking@frandzel.com
- Amir Gamliel amir-gamliel-9554@ecf.pacerpro.com, cmallahi@perkinscoie.com;DocketLA@perkinscoie.com
- Robert P Goe kmurphy@goeforlaw.com, rgoe@goeforlaw.com;goeforecf@gmail.com
- Nancy S Goldenberg <u>nancy.goldenberg@usdoj.gov</u>
- Peter F Jazayeri <u>peter@jaz-law.com</u>
- Daniel A Lev dlev@sulmeyerlaw.com, ccaldwell@sulmeyerlaw.com;dlev@ecf.inforuptcy.com
- Robert K Lu edw21600@gmail.com
- Kyle J Mathews kmathews@sheppardmullin.com
- Juliet Y Oh jyo@lnbyb.com, jyo@lnbrb.com
- Ho-El Park hpark@hparklaw.com
- Ronald N Richards ron@ronaldrichards.com, morani@ronaldrichards.com
- United States Trustee (SA) ustpregion16.sa.ecf@usdoj.gov

		☐ Service information contin	nued on attached page
case or adversary proced first class, postage prepa	D STATES MAIL:, I served the following persons and/o eding by placing a true and correct copy the aid, and addressed as follows. Listing the judgment than 24 hours after the document in the property of the state of the service of the servic	hereof in a sealed envelope in the judge here constitutes a declarati	e United States mail,
		☐ Service information contin	nued on attached page

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

for each served th writing to	person or entity served): Pursuant to F.R.Civ.P. 5 ne following persons and/or entities by personal de such service method), by facsimile transmission a con that personal delivery on, or overnight mail to, t	AIL, FACSIMILE TRANSMISSION OR EMAIL (state method and/or controlling LBR, on (date)9/9//2021, I livery, overnight mail service, or (for those who consented in nd/or email as follows. Listing the judge here constitutes a ne judge will be completed no later than 24 hours after the
	operations@mdregionalcenter.com otanaka@mdproperties.com	
		☐ Service information continued on attached page
I declare	under penalty of perjury under the laws of the Uni	ed States that the foregoing is true and correct.
9/9/21	Edward Wu	/s/ Edward Wu
Date	Printed Name	Signature